



NSTAR Electric & Gas Corporation
800 Boylston Street
Legal Department – 17th Flr.
Boston, MA 02199

William S. Stowe
Assistant General Counsel

Phone: 617-424-2544
Fax: 617-424-2733
E-mail: william_stowe@nstaronline.com

March 18, 2002

Mary L. Cottrell, Secretary
Department of Telecommunications and Energy
One South Station – 2nd Flr.
Boston, MA 02110

Re: Boston Edison Company
D.T.E. 01-95

Dear Secretary Cottrell:

Please find for filing in the above-referenced matter Boston Edison Company's Eighth Set of Information Requests to Wellesley Municipal Light Plant.

Thank you for your attention to this matter.

Very truly yours,

William S. Stowe

Enclosure

cc: Robert Hayden, Hearing Office
Eric Krathwohl, Esq.
Kenneth Barna, Esq.

COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT TELECOMMUNICATIONS AND ENERGY

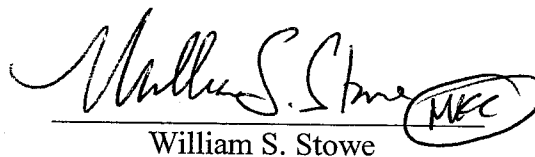
Petition Franklin W. Olin College of Engineering

D.T.E. 01-95

CERTIFICATE OF SERVICE

I hereby certify that I served copies of Boston Edison Company's Eighth Set of Information Requests upon all parties in this proceeding.

Dated this 18th day of March, 2002.


William S. Stowe

**COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY**

Petition of Franklin W. Olin College of Engineering

D.T.E. 01-95

**BOSTON EDISON COMPANY'S, d/b/a NSTAR ELECTRIC,
EIGHTH SET OF INFORMATION REQUESTS TO
WELLESLEY MUNICIPAL LIGHT PLANT**

Below are Boston Edison Company's, d/b/a NSTAR Electric ("Boston Edison"), eighth set of information requests in this proceeding. For purposes of these information requests, please refer to the instructions provided with the second set of information requests that Boston Edison propounded.

- BE-8-1 With respect to Mr. Joyce's reference to Mr. Hannabury's Affidavit ("Although some expenditures would be required for making the connection with [Wellesley Municipal Light Plant] ...") (Joyce Testimony at 5), please identify the specific facilities and pieces of equipment needed for the proposed interconnection. Please provide the cost figures for Wellesley Municipal Light Plant ("WMLP") to provide service to Franklin W. Olin College of Engineering ("Olin"), including presumed distances for interconnection, cost per foot, and total cost.
- BE-8-2 With respect to WMLP's provision of service to the Massachusetts Water Resource Authority ("MWRA") facility in the Town of Needham, as referenced on page 5 of Mr. Joyce's testimony, please indicate: the purpose and function of the MWRA facility, the current and expected future load of such facility, and the distance and cost of WMLP's interconnection to such facility.
- BE-8-3 Please reference Mr. Joyce's statement on page 7 of his testimony that, with regard to WMLP's provision of service to Olin, "[t]he primary benefit to both Olin and WMLP is that the WMLP's distribution infrastructure is already in place." In the Olin and WMLP plans, see Attachment BE-1-5A, there is an indication that additional work must be completed before WMLP can provide permanent service to Olin. Please specifically list any additional work that would need to be completed by: (a) WMLP; or (b) Olin for WMLP to provide permanent service to Olin. Please also provide a detailed cost assessment of any and all such work.
- BE-8-4 Please reference Mr. Joyce's statement on page 7 of his testimony that, with regard to WMLP's provision of service to Olin, "[t]he primary benefit to both Olin and WMLP is that the WMLP's distribution

infrastructure is already in place.” Please specifically list any work that WMLP has done since 1997 with regard to its “distribution infrastructure” for the provision of service to Babson College (“Babson”).

- BE-8-5 With respect to Mr. Joyce’s reference to D.P.U. 86-45/D.P.U. 86-144 on page 5 of his direct testimony, please provide the following WMLP exhibits from that proceeding: Exhs. WBPW-1, 2, 4, 30, 33, 36, 37, 52, 53, 56 (including exhibits MRB-2, MRB-3, MRB-4, MRB-7, MRB 8, MRB-9), 73 and 107.
- BE-8-6 Please provide copies of any and all contracts, statutory grants of authority, permits, municipal orders, or grants of location WMLP has received from the Town of Needham authorizing WMLP to provide electric service to customers in Needham.
- BE-8-7 Please refer to the question and answer on page 3 of Mr. Joyce’s direct testimony (“Q. To your knowledge, has Boston Edison ever provided service to *this particular area*?” (emphasis added)). Please provide a detailed description of “this particular area,” including a color-coded map specifically indicating “this particular area.” Please also indicate whether the term “this particular area” refers to:
- (a) Olin’s entire 70-acre parcel in Needham;
 - (b) All of Babson’s currently existing facilities and buildings located in Needham; or
 - (c) The parking lot and associated street lighting, as discussed in Mr. Joyce’s previous answer on page 3 of this testimony.
- BE-8-8 Regarding Information Request BE-8-7, above, and the area referenced as “this particular area,” please identify:
- (a) any and all WMLP equipment and facilities located in “this particular area;”
 - (b) any other equipment and facilities (existing prior to the construction of the “temporary service” to serve Olin) used to distribute service received from WMLP to “this particular area” by a third party and identify such third party; and
 - (c) any electric load (existing prior to the construction of the “temporary service” to serve Olin) located in “this particular area.”
- BE-8-9 With reference to Mr. Joyce’s statement that “[t]he primary power supply

from the WMLP would come from BECo's Newton Station 292's voltage regulated transformers" (Joyce Testimony at 9). Please explain the basis for this statement and include any supporting documentation.

- BE-8-10 With reference to Mr. Joyce's testimony concerning the "dedicated underground cable supply" (Joyce Testimony at 7) please describe this supply, including reference to the system diagrams or plans supplied in the Attachments to BE-7-3 and providing relevant line numbers and identification of the station from which this supply originates. For both the primary and the backup supply, please provide the total length of such supply lines and the portions of each that are underground and that are overhead.
- BE-8-11 With reference to Mr. Joyce's testimony concerning the absence of power outages to this service area for at least the past seven years (Joyce Testimony at 8) please define the service area that is being referenced and indicate whether such statement includes momentary outages or other short duration outages during the operation of automatic switching equipment.

Dated: March 18, 2002